

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DEBORAH D. PETERSON, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN, et al.,

Defendants.

Case No. 10-CIV-4518 (KBF)

**NOTICE OF MOTION FOR
RECONSIDERATION**

CITIBANK, N.A.,

Third-Party Petitioner,

v.

JAMES OWENS, et al.,

Third-Party Defendants.

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PLEASE TAKE NOTICE that on a date and time set by the Court, Defendant Banca UBAE SpA (“UBAE”) shall move before the Honorable Katherine B. Forrest, U.S.D.J. at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312 for an Order, pursuant to Local Civil Rule 6.3, granting reconsideration of the Court’s Order denying UBAE’s motion to dismiss for lack of personal jurisdiction.

PLEASE TAKE FURTHER NOTICE that as grounds for this motion, UBAE asserts that the Court’s decision contains statements that are not supported by the record and that are inconsistent with settled principles of personal jurisdiction. UBAE will further show that it never “transacted business” in New York and it had no “agents” in New York working on its behalf. UBAE will also show that it has been denied federal due process because it has no contacts—let alone minimum contacts—that would justify the exercise of worldwide jurisdiction by this Court. Finally, UBAE will demonstrate that the Court’s statements concerning its alleged relationship with the other defendants are incorrect and unfairly prejudicial to UBAE.

PLEASE TAKE FURTHER NOTICE that in support of its motion, UBAE shall rely on its Memorandum of Law in Support of Motion for Reconsideration and this Notice of Motion.

PLEASE TAKE FURTHER NOTICE that oral argument on the motion is respectfully requested.

Dated: Newark, New Jersey
March 14, 2013

PATTON BOGGS LLP

By:


Ugo Colella (*admitted pro hac vice*)

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